

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, Both	)	
Individually and as Legal Guardian of	)	
Shane Allen Loveland; and JACOB	)	
SUMMERS	)	
Plaintiff(s),	)	<b>8:18CV127</b>
	)	
v.	)	<b>PLAINTIFFS' INITIAL</b>
	)	<b>DISCLOSURE OF FACT AND</b>
THE GOODYEAR TIRE & RUBBER	)	<b>EXPERT WITNESSES</b>
COMPANY	)	
Defendant(s).	)	

Plaintiffs by and through their attorneys, and in accordance with this Court's May 24, 2015 order disclose the following.

**A. Names and address of all non-expert witnesses:**

1. Rysta Leona Susman,  
Shane Allen Loveland  
Jacob Summers  
c/o Kyle W. Farrar  
KASTER, LYNCH, FARRAR & BALL, LLP  
1010 Lamar, Suite 1600  
Houston, Texas 77002  
713.221.8300  
713.221.8301 (Fax)  
[kyle@fbtrial.com](mailto:kyle@fbtrial.com)

*and*

Paul Godlewski  
SCHEWEBEL, GOETZ & SIEBEN, P.A.  
5120 IDS Center  
80 S. 8<sup>th</sup> Street, #5120  
Minneapolis, Minnesota 55402  
612.377.7777  
612.333.6311 (Fax)  
[pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)  
Plaintiff

2. Shane Allen Loveland  
c/o Kyle W. Farrar  
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Plaintiff

3. Jacob Summers  
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[pgodlewski@schwebel.com](mailto:pgodlewski@schwebel.com)  
Plaintiff

4. Larry Blair  
224 E. 4<sup>th</sup> Street  
Axtell, NE 68924

Driver of the subject vehicle

5. Current and former employees of The Goodyear Tire & Rubber Company  
c/o Edward S. Bott, Jr.  
GREENSFELDER, HEMKER & GALE, P.C.  
10 South Broadway, Suite 2000  
St. Louis, Mo. 63102  
314.516.2690  
314.241.4245 (Fax)  
[esb@greensfelder.com](mailto:esb@greensfelder.com)

*and*

Jennifer D. Tricker  
BAIRD HOLM, LLP  
1700 Farnam Street, Suite 1500  
Omaha, Nebraska 68102  
402.344.0500  
402.344.0588 (Fax)  
[jtricker@bairdholm.com](mailto:jtricker@bairdholm.com)

6. Trooper Joseph Flasnack, Badge No. 510,  
Nebraska State Patrol, 1600 Highway 2,  
Lincoln, Nebraska 68502.  
(402) 471.4545.  
Trooper Flasnack responded to the accident scene.
7. Rob Gibson, (402) 499-5550.  
Mr. Gibson witnessed the accident.
8. Mary K. Gibson, (402) 432-0171.  
Ms. Gibson witnessed the accident.
9. Kramer's Towing,  
3405 N. Highway 281,  
Grand Island, Nebraska.  
Kramer Towing towed the subject vehicle from the accident.
10. Action Care Ambulance Inc.  
PO Box 2439  
Parker, CO 80134  
Medical transport for Shane Loveland
11. Representatives/employees of Wood River Rescue Unit,  
410 W. Green Street,

Wood River, Nebraska 68883.  
(308) 583-2066.  
Responded to the accident scene.

12. Representatives/employees of Good Samaritan EMS  
902 E. B Street,  
McCook, Nebraska  
(308) 345-4434.  
Responded to the accident scene.
13. Representatives/employees of Shelton Volunteer Fire & Rescue.  
218 C. Street,  
Shelton, Nebraska  
(308) 647-6772.  
Responded to the accident scene.
14. Representatives/employees of Dandee Concrete Construction Co. Inc.,  
305 E. 8<sup>th</sup> Street, PO Box 2587,  
Kearney, Nebraska, 68848  
(308) 627-6660.  
Owner of the subject vehicle.
15. Daniel T. Buser  
Dandee Concrete Construction Co. Inc.,  
305 E. 8<sup>th</sup> Street, PO Box 2587,  
Kearney, Nebraska, 68848  
(308) 627-6660.  
President of Dandee Concrete Construction
16. Current and former employees of Farm Bureau Insurance Company  
c/o Nicole M. Kustermann, YOST & BAILL, LLP,  
220 South Sixth Street, Suite 2050,  
Minneapolis, Minnesota 55402.  
Worker's compensation insurance carrier for Dandee Construction Co. Inc.,  
and has possession of the subject vehicle.
17. CHI Health Good Samaritan  
10 E 31<sup>st</sup> St.  
Kearney, NE 68847  
Medical provider for Shane Loveland
18. Madonna Rehabilitation Hospital  
5401 South St.  
Lincoln, NE 68506  
Medical provider for Shane Loveland

19. Colorado Blood and Cancer Care  
701 E. Hampden Ave, Ste 532  
Englewood, CO 80113  
Medical Provider for Shane Loveland
20. Learning Services Neurobehavioral Institute  
7201 W Hampden Ave  
Lakewood, CO 80227  
Medical provider for Shane Loveland
21. Swedish Medical Center  
501 E. Hampden Ave  
Englewood, CO 80113  
Medical provider for Shane Loveland
22. Panorama Orthopedics & Spine Center  
1060 Plaza Dr., Ste. 200  
Littleton, CO 80129  
Medical Provider for Shane Loveland
23. Kearney Regional Medical Centre  
PO Box 3186  
Omaha, NE 68103  
Medical provider for Jacob Summers
24. Madonna Rehabilitation Hospital  
5401 South Street  
Lincoln, NE 68506  
Medical provider for Jacob Summers
25. University of Nebraska Medical Center  
10304 Crown Point Ave  
Omaha, NE 68134  
Medical Provider for Jacob Summers
26. New West Sports Medicine and Orthopaedic  
2810 West 35<sup>th</sup> St, Ste 1  
Kearney, NE 68845  
Medical provider for Jacob Summers

**B. Name and address of all expert witnesses:**

27. David Southwell  
27 Netherby Avenue  
Netherby, South Australia 5062

28. Micky Gilbert  
Gilbert Engineering, LLC  
16254 W. 77<sup>th</sup> Lane  
Arvada, Colorado 80007
29. Craig Lichtblau  
Physical Medicine and Rehabilitation Board Certification  
550 Northlake Boulevard  
North Palm Beach, Florida 33408
30. Oscar Padron  
Turner & Associates, LLP  
14505 Commerce Way, Ste 500  
Miami Lakes, Florida 33016
31. Lila Laux, PhD  
Human Factors Consulting  
417 Leyden St.  
Denver, CO 80220

Respectfully submitted,

**KAster, LYNCH, FARRAR, & BALL, L.L.P.**

By: \_\_\_\_\_



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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 10, 2018, I forwarded a copy of the foregoing to the following:

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Kyle W. Farrar